

### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

#### REGION 6 1445 ROSS AVENUE, SUITE 1200 DALLAS TX 75202-2733

DEC 0 1 2015

Shellie Chard-McClary, Director Water Quality Division Oklahoma Department of Environmental Quality P.O. Box 1677 Oklahoma City, OK 73101-1677

Dear Ms. Chard-McClary:

Please find enclosed the Fiscal Year 2015 program review of the Oklahoma Department of Environmental Quality's (ODEQ) Public Water Supply Supervision (PWSS) Program. We are also including a 2014 fiscal year summary since a program review was not conducted. The purpose of the annual program review is to assess the status of the State's drinking water primacy program, including the State's ability to achieve new PWSS primacy requirements, implementation of existing regulations, and other key drinking water activities in accordance with Title 40 of the Code of Federal Regulations, Part 142.17. In addition, the annual program review serves as a valuable tool in identifying strengths and challenges in the State's ability to fulfil the primacy delegation requirements and adhere to the Memorandum of Understanding signed by EPA and ODEQ when primacy for the PWSS program was delegated to the State.

Thank you for your participation in the PWSS program review process. Please contact Nichole Foster of my staff at (214) 665-7248, should you have questions or concerns.

Sincerely,

James R. Brown, P.G.

Associate Director

Safe Drinking Water Branch

Amma P. Bru

Enclosure

cc: Michele Welsh, ODEQ (w/enclosure) Kay Coffey, ODEQ (w/enclosure)

# U.S. Environmental Protection Agency Fiscal Year 2015 Program Review with 2014 Program Summary

for the

Oklahoma Department of Environmental Quality Public Water System Supervision Program

#### Table of Contents Introduction......3 T. II. III. Primacy Requirements ......4 IV. Rule Adoption & Implementation .......5 RTCR Adoption......5 В. Ċ. D. E. F. Surface Water Treatment Rule /Interim Enhanced Surface Water Treatment Rule..... 8 G. H. Radionuclides 8 K. L. M. Variances & Exemptions Rule ......9 VI. VII. Tribal Lands 9 VIII. Capacity Development .......9 A. В. Operator Certification......9 C. D. E. F. G. H. IX. A. В.

| Introduction   | A1 |
|--|----|
| Summary  | A1 |
| October 2014-Operator Certification and PWSS/SRF Grants                  | A2 |
| December 2014-Capacity Development                                       | A2 |
| January 2015-Source Water Protection, Water Security, & Sanitary Surveys | A3 |
| February 2015-SDW Rule Management  | A3 |
| March 2015-Laboratory Certification & Capacity                           | A5 |
| April 2015-General Counsel   |    |
| May 2015-Enforcement   | A5 |
| Attachment B – 40 CFR 142.10 Primacy Requirements                        | B1 |
| Attachment C - Primacy Revision & Program Updates for Oklahoma           | C1 |
| Attachment D – FY2015 Oklahoma Violation Data & Inventory Information    | D1 |
| Attachment E – WOD-Organizational Chart                                  | E1 |

## I. Introduction

Title 40 of the Code of Federal Regulations (40 CFR) Part 142.17 (a)(1) states: At least annually the Administrator shall review, with respect to each State determined to have primary enforcement responsibility, the compliance of the State with the requirements set forth in 40 CFR part 142, subpart B, and the approved State primacy program. This report summarizes the required primacy end-of-year (EOY) review of the Oklahoma Department of Environmental Quality (ODEQ) Public Water Supply Supervision (PWSS) Program by the Environmental Protection Agency (EPA) Region 6 (R6) Source Water Protection Branch, Drinking Water Section.

The ODEQ program elements, which were previously adopted by the State and approved by EPA to meet 40 CFR 142.10 primacy requirements, are examined as well as State activities to meet new primacy requirements and initiatives under the 1996 Amendments to the Safe Drinking Water Act (SDWA). ODEQ's achievements, activities, and shortfalls are highlighted throughout the report.

On Thursday, August 6, 2015, members of the EPA R6 Drinking Water Section conducted the annual EOY review of ODEQ's PWSS program. The following people participated in the review:

### **EPA**

Blake Atkins, Chief, Drinking Water Section Tonia Biggs, Oklahoma Drinking Water Enforcement Office Nichole Foster, Oklahoma Drinking Water State Program Manager Greg Parish, Oklahoma Drinking Water PPG Project Officer (via phone) Javier Balli, Oklahoma Drinking Water SRF Project Office (Via phone)

**ODEO** Shellie Chard-McClary, Director, Water Quality Division Carl Parrott, Chief Engineer, Water Quality Division Mark Hildebrand, Environmental Programs Manager, Water Quality Division Chris Armstrong, Director, State Environmental Laboratory Services Division Jennifer Boyle, Environmental Attorney, Legal Counsel Patty Thompson, Construction & Operation Manager, Water Quality Division Cheryl McLure, Budget Analyst, Administrative Services Vicki Reed, Drinking Water State Revolving Fund Program Coordinator Michele Welsh, Program Manager, Public Water Supply Compliance Tracking Section Sheri McGuire, Phase II/V (minus SOCs) and Rads Coordinator Bryan Niblett, Total Coliform Coordinator Erin Lovelady, CCR, and Lab Sample Submission Coordinator Jennifer Alig, Boil Advisories & GWR Coordinator Jamie Henson, PWS Inventory and SOCs Coordinator Steven Wright, SDWIS Coordinator Emily Hoskin, DBP Coordinator Laurelin Hodgson, Lead & Copper Coordinator Jordan Canary, SWTR Coordinator Eric VanEck, Compliance Assistant

Kay Coffey, Engineering Manager, Public Water Supply Enforcement Section

Candy Thompson, PWS District Engineer
Isaac Cornelson, PWS District Engineer
Shaun Wiegmann, PWS District Engineer
Shane Hacker, PWS District Engineer
Ramona Haggins, Administrative Assistant, Public Water Supply Enforcement Section
Brandon Bowman, Capacity Development Coordinator
Chris Wisniewski, Operator Certification Manager
Andy Callaway, Operator Certification Coordinator
Robert Huber, ECLS Manager

## II. Summary

ODEQ's PWSS program continues to make changes and is evolving into an efficient and effective program. Changes in both the agency's overall organizational structure along with programmatic shifts should result in increased communication between state regulators, PWSs and citizens of Oklahoma. New hires and career growth opportunities for staff will pave the way to ensuring continued protection of public health in the state of Oklahoma. Below are a few highlights of the successes and challenges the program has faced in 2015 and anticipates for the upcoming year.

- <u>Rule Adoption</u>—At this time, ODEQ is current on all primacy requirements and initiatives under the 1996 Amendments to the Safe Drinking Water Act (SDWA).
- <u>Primacy Packages</u>—ODEQ prepared and submitted a primacy package for the Revised Total Coliform Rule (RTCR) on April 3, 2015. EPA Region 6 is in the final stages of seeking Federal Register publication and entering into the 30-day comment period before granting final primacy.
  - PWS Definition Changes—During the RTCR primacy package review, a few minor edits were suggested to the current PWS definition. ODEQ and EPA have worked through these changes, and ODEQ is prepared to seek approval for the changes in the upcoming legislative session.
  - <u>Staffing</u>—EPA Region 6 is pleased to learn of the new hires under the Compliance Tracking Section and PWS Enforcement Section.
- <u>Tribal Lands</u>—Questions still linger over authority for PWSs where tribally owned systems provide water to non-tribal Oklahoma citizens and/or the system's components fall on both tribal trust and non-trust land.

# III. Primacy Requirements

The annual program review required under 40 CFR Section 142.14 requires that EPA conduct a program review at least annually to determine if the State is meeting the requirements of 40 CFR Section 142.10 in order to retain primacy. These requirements include the following statutory categories:

- Adoption of state regulations that are no less stringent than federal requirements
- Adoption and implementation of enforcement procedures
- Recordkeeping and reporting
- Variances and exemptions
- Planning for provision of safe water in emergencies

In accordance to 40 CFR Section 142.10, there are 15 elements found in the above five statutory categories, defined under Attachment A of this report. It is these 15 elements that are evaluated by EPA R6, either through the annual PWSS program review conducted by the Source Water Protection Branch, Drinking Water Section; the enforcement program review by the Enforcement and Compliance Assurance Division; or the financial review on the DWSRF program also conducted separately by the Assistance Program Branch, State and Tribal Programs Section.

# IV. Organizational Structure & Staffing

In the early part of 2015, ODEQ's Water Quality Division went through a re-organization. There are still four intermediate level management position under the direction of the Division Director, managing multiple sections. The sections have regrouped to provide efficiency and collaboration in managing related areas. Attachment D shows the organizational structure of the ODEQ Water Quality Division. Under the new structure, The Next Gen Reporting, Technical Support and QA\QC group along with the Operator certification group reports to the Next Gen Reporting, Technical Support & Operator Certification Manager; The Construction Permitting/Engineering Report group, the Watershed Planning group, and the Reclaimed Water/Water Reuse group, are supervised by the Water Quality Planning Manager. The PWS Compliance Tracking group, The PWS Field Inspection Enforcement group, and The DWSRF group are supervised by the Public Water Supply Manager. The fourth section, Wastewater, does not oversee any sections with PWSS Program responsibilities.

Staffing changes, resignations and new hires, continue in both the Compliance Tracking group and the PWS Field Inspection Enforcement group. Both groups have been fortunate enough to fill most of the vacancies. Work is ongoing to provide customer support for compliance help with drinking water standards and ultimately increase public health protection. This approach can be seen in the recent decision to move the Compliance Tracking group away from rule based management to a more regional approach. Each compliance officer will be responsible for a certain geographical area. ODEQ has and will continue to invest resources in this transition. To help facilitate the change, ODEQ contracted with the Cadmus Group to evaluate and provide feedback on resources, program efficiencies, staff assignments, and organization. EPA Region 6 is pleased to see this re-energizing transformation and is available to provide any rule trainings or assistance in the transition.

# V. Rule Adoption & Implementation

### A. RTCR Adoption

At this time, ODEQ is current for all primacy requirements and initiatives under the 1996 Amendments to the Safe Drinking Water Act (SDWA) and has submitted a primacy packet for the Revised Total Coliform Rule (RTCR). EPA Region 6, received ODEQ's RTCR primacy packet on April 3, 2015, and appreciates ODEQs work to answer questions on the crosswalk. ODEQ's RTCR primacy packet has been approved with comments and is in the process of proceeding with Federal Notification of rule adoption by ODEQ.

During the RTCR primacy packet review, concern was raised about the PWS definition found in Oklahoma's Administrative Code. The current definition includes additional

wording and lacks punctuation that could be interpreted in such a way that it does not meet the same stringency of the Federal definition. Various conference calls were conducted to clear up the intent of the definition. As of November 18, 2015, ODEQ will propose the definition listed below.

## **Current Definition**

"Public water supply (PWS) system" means a system, whether publicly or privately owned, which supplies water under pressure to the public through pipes or other constructed conveyances whether receiving payment or not. Multi-family dwellings, which are constructed, inspected, and maintained under State Health Department-approved plumbing code, purchase water from a permitted water system, do not provide treatment, and do not resell water, are not classified as a Public Water Supply systems:

- (A) "Community water system" means any PWS system, which serves at least fifteen (15) service connections, used by year-round residents or regularly serves twenty-five (25) year-round residents.
- (B) "Non-community water system" means any PWS system, which serves an average of at least 25 individuals at least 60 days per year but is neither a community water system nor a non-transient non-community water system.
- (C) "Non-transient non-community (NTNC) water system" means any PWS system that is not a community water system and that regularly serves at least 25 of the same persons over 6 months per year.
- (D) "Minor water system" means any other PWS system not included in (A), (B), or (C) of this definition. These water systems may be state-licensed facilities or non-licensed facilities and are regulated in OAC 252:624."

#### **Proposed Definition**

"Public water supply (PWS) system" means a <u>any</u> system, whether publicly or privately owned, providing water for human consumption, which supplies water under pressure to the public through pipes or other constructed conveyances, if such system has at least 15 service connections or regularly serves an average of at least 25 individuals daily at least 60 days per year, whether receiving payment or not. Multi-family dwellings, which are constructed, inspected, and maintained under State Health Department-approved plumbing code, purchase water from a permitted water system, do not provide treatment, and do not resell water, are not classified as a Public Water Supply system. The following are the categories of Public Water Supply systems:

- (A) "Community water system" means any PWS system, which serves at least 15 service connections, used by year-round residents or regularly serves 25 year-round residents.
- (B) "Non-community water system" means any PWS system, which serves an average of at least 25 individuals at least 60 days per year but is neither a community water system nor a non-transient non-community water system.
- (C) "Non-transient non-community (NTNC) water system" means any PWS system that is not a community water system and that regularly serves at least 25 of the same persons over 6 months per year.

(D) "Minor water system" means any other PWS system not included in (A), (B), or (C) of this definition. These water systems may be state-licensed facilities or non-licensed facilities and are regulated in OAC 252:624.

This definition will be presented at the October 2015, Water Quality Management Advisory Council and then sent to the Environmental Quality Board during the January/February 2016, meeting. After an approval vote by the board, the PWS definition will be submitted to the Legislative session for review. If approved, the new PWS definition would be effective September 2016.

## B. Rule Implementation

In the upcoming year, the Compliance Tracking Group looks to move away from rule-based compliance officers to a regional approach. This approach will include having staff responsible for a particular area. By moving to this approach, the group should be able to provide comprehensive customer service when, for example, a PWS calls with both DBP2 and arsenic violations questions, one staff member will be able to provide answers on both subjects. Currently, if a PWS called with multiple regulation questions, they would be passed around to the various compliance officers. Over the next couple of months training sessions will be held among staff to learn the requirements of each regulation and develop SOPs.

Implementation work in FY2015 has included an increase in emergency water events requiring boil orders. This increase can be attributed to the record rains seen throughout the state this spring. Work in 2015, also included addressing the outstanding items found on the 2012 Corrective Action Plan, resulting from the 2011 Program File Review.

- C. Stage 1 and Stage 2 Disinfectants and Disinfection Byproducts Rule
  Staff continues to handle compliance determinations for both the remaining elements of
  Stage 1 DBPR and Stage 2 DBPR. Training both for PWSs and ECLS has been
  conducted and was quite successful. Work also continues on cleaning up data and
  issuing consent orders.
- D. Total Coliform Rule & Upcoming Revised Total Coliform Rule

  TCR implementation has a new coordinator, Bryan Niblett. Work continues on
  implementing the existing TCR and learning the upcoming RTCR. Various activities
  related to RTCR include developing both paper and electronic versions for the various
  assessments and sampling plans.

#### E. Ground Water Rule

ODEQ has been sending educational information and conducting outreach training session for the GWR. Staff continues to work with SDWIS\State to determine compliance for the various requirements of the GWR, i.e., trigger sampling, wholesale notification, and corrective actions. During FY15, ODEQ did see an increase in the number of source investigations needed based on *E. coli* triggers. It should be noted that Oklahoma received a record setting amount of rain during late spring and early summer that could have led to some of these triggered events.

- F. Long Term 1 & 2 Enhanced Surface Water Treatment Rule
  Reminder letters for both past violations and upcoming sampling requirements, for LT2's second round of *cryptosporidium* monitoring, have been sent to water systems required to comply with LT1 and LT2. Work has also been done to clean up SDWIS\State Facility Analyte Indicator Levels (FANLs) not properly entered. These incorrect FANLS were generating false candidate violations in SDWIS\State when running compliance determination support.
- G. Surface Water Treatment Rule /Interim Enhanced Surface Water Treatment Rule Starting January 5, 2015, ODEQ started a new monthly operational report (MOR) submission for systems serving more than one thousand customers. The MOR process is now more standardized for all PWSs. The response/submission rate has been around 70-80%. Coordination on treatment levels continues to engage both the District Engineers and the DBP Rule Coordinator for systems showing either a turbidity or disinfection residual problem.

### H. Lead and Copper Rule

Efforts continue on educating consecutive connection systems about sampling requirements under the rule. ODEQ is in the final stages of phasing in sampling for consecutive connection systems and revisiting the potential for a standardized monitoring SOP for both wholesaler and consecutive systems.

I. Phase II/V including Arsenic & Nitrate
Staff continues to improve compliance and timely notification for MCL violations.
SDWIS\State continues to be a useful tool for running compliance.

### J. Radionuclides

Improving data flow and timely samples, has help staff make timely compliance determinations. The new adoption and certification for radium test, Georgia Tech method, has also played a role in the data flow process.

### K. Consumer Confidence Report

Based on EPA's Headquarters updated guidance, the electronic delivery option continues to be a big push and selling point with water systems on how they can deliver their CCRs. Staff will continue to spread the word to small PWSs and focus trainings on the use of electronic distribution.

### L. Public Notification

Timely determinations under the Public Notification (PN) Rule has been an area of concern in the past. EPA Region 6 is hopeful that the new transition to a regional compliance approach will allow for a better more streamlined implementation of the PN rule.

### M. Variances & Exemptions Rule

The Variances and Exemptions (V&E) Rule was revised in August 1998, in accordance with the 1996 Safe Drinking Water Act Amendments. Based on past policies and discussions, ODEQ did not wish to allow V&Es and did not seek primacy authority for the V&E rule. However at this time, talks are underway to potentially issue a V&E. In order to issue a V&E ODEQ will need to request primacy authority for the rule.

# VI. Program Enforcement

District Engineers continue to address a wide range of issues including wells in use that do not meet construction standards *E. coli* contamination requiring assessments oversized designs and citizen outreach. During the review, each District Engineer highlighted successes and challenges from 2015. These highlights demonstrate the high caliber of work being done, along with the effort and level of commitment it takes from staff to help PWSs achieve compliance.

During EPA Region 6 implementation of DBPR2 and GWR, EPA generated about 150 to 180 violations per quarter which ODEQ "inherited" upon their adoption of these rules. To streamline the processing of these violations, ODEQ requests EPA Region 6 to review a notice of violation (NOV) template to inform PWSs of the violation and the pending consent order (CO). This letter would then extend the NOV to cover the outstanding violations.

## VII. Tribal Lands

Tribal oversight, inspections, compliance, and authority continues to be a pressing issue. ODEQ desires to have concurrent jurisdiction or joint inspections for Tribal PWSs where drinking water is provided to non-tribal citizens of Oklahoma. An exact understanding on the authority for PWSs, where systems reside on both tribal-trust and non-tribal lands, eludes both ODEQ and EPA. Most recently, Wyandotte's newest well, Well # 3, is on non-trust land and is regulated by ODEQ while the other 2 wells are on EPA Region 6's inventory list. ODEQ is in need of clear guidance from EPA's Tribal Affairs Office.

# VIII. Other PWSS Program Initiatives & Statutory Requirements

## A. Capacity Development

With hiring of a permanent coordinator, Brandon Bowman, the Capacity Development program continues to help water systems with technical, financial, and managerial roles. PWSs that apply for funding must complete a capacity development assessment. These assessment forms were revamped in the previous year and help water systems understand where to direct efforts and plan for the future.

### B. Operator Certification

Renewals for Operator Certification is up 60% this year. During the peak of renewal month of May, the agency updated the computer program to process these renewals. Andy Callaway, worked relentlessly to learn the new program and develop workarounds to keep the renewal process running seamlessly. Contract relations with Rose State College continue to be an important part of the program. Currently, Rose State College can offer over 1,000 courses approved for operator certification credits. Work still

continues on the on-line license renewal through the state website, OK.gov. The program hopes to have the on-line testing available in the upcoming year.

### C. Source Water Protection

ODEQ's Environmental Complaints and Local Services (ECLS) continues to provide support to Oklahoma's source water protection program through well head protection activities. Implementation efforts focused on verifying GPS locations of wellheads and surface water intakes. Technical assistance continues to be provided in the form of help with rules and regulations, onsite visits, phone calls, factsheets, and providing representative staff from ODEQ for public meetings when requested.

### D. AWOP

ODEQ remains active in state, regional, and national AWOP initiatives, despite reduced staffing among its district engineers. The ODEQ optimization team has continued its efforts to introduce PWSs to Performance Based Training (PBTs) and technical trainings. The team has also participated in CPEs, multistate CPEs, teleconferences, and national meetings. While Steven Hoffman has left the section, Candy Thompson will be taking over to continue moving the AWOP program forward in Oklahoma. In 2016, efforts will be made to conduct three CPEs along with data integrity studies.

## E. Water Security and Emergencies

ODEQ continues to oversee the Water/Wastewater Agency Response Network (WARN) program for Oklahoma, SoonerWARN. Richard McDaniel is the new ODEQ point of contact for emergency events. In July, ODEQ hosted an Emergency Response Exercise involving 10 water utilities, Oklahoma Rural Water Association, ODEQ and EPA HQ. Response activities in 2015 included assistance to over 100 water systems impacted by heavy rainfall and flooding.

### F. Sanitary Surveys

Under the IESWTR and LT1, sanitary surveys are required for all surface water systems and all systems under the direct influence of surface water. The GWR, which became effective December 1, 2009, also requires sanitary surveys for all ground water systems. The ECLS staff conducts these surveys, and should a deficiency be noted during the survey, ECLS staff will follow-up with the system within 15 days. If the deficiency still is not corrected, ECLS will send a referral to WQD. The appropriate District Engineer will attempt to address the issue informally prior to formal enforcement action being taken.

## G. Data Reporting & SDWIS/State

ODEQ continues to utilize the SDWIS\State software suite to implement rules and conduct business with laboratories. Upcoming efforts will be focused on addressing and evaluating issues with DBP2 violations. Based on the current SDWIS\Prime activities, ODEQ will continue to be active on workgroups and will move cautiously in to the new system.

In addition, to SDWIS\Prime the new Compliance Monitoring Data Portal (CMDP) was rolled out. The CMDP training was lacking a clear and complete message for Oklahoma labs to understand how this will impact them. ODEQ requests a clearer message regarding the use of the CMDP for private labs.

Federal reporting continues to work smoothly for ODEQ, minus an unknown error message for LT2 violations. Science Applications International Corporation (SAIC), along with Shirley Mlachak from Region 6, will be working with Jamie Henson to resolve the issue.

## H. Lab Capacity & Certification

ODEQ State Environmental Laboratory Services Division continues to provide excellent support to the Water Quality Division with PWS sampling requirements. Customer services for PWSs continues to be a key value found within the lab. While general revenue funding has been reduced by \$12 million, funding for training for both private labs and WQD continues to be a focus. Expanding certification to include sampling for *Cryptosporidium* and hexavalent chromium are also key elements being achieved by the lab. In October 2015, the lab is hopeful to merge its two LIMS systems into one. The new system will be integrated into SDWIS\State.

# IX. Funding

A. PWSS grant (Performance Partnership Grant (PPG))

ODEQ received at total of \$1,391,000 in PWSS funds in the FY2015 allocation (compared to \$1,391,000 in FY14, \$1,340,000 in FY13 and \$1,414,000 in FY12):

Based on current levels with a continuing resolution, for FY16 ODEQ has 19.5% of the FY15 allotment available, \$270,626.00. As a reminder, the allotments can change from year to year based on the data that the State reports in December of every year. The allotment formulas are based on population (20%), geographical area (10%), the number of community and non-transient non-community water systems (56%), and the number of transient non-community water systems (14%).

EPA awarded \$463,903 on 8/12/14 for the first portion of the FY2015 award. This was forward funding from FY14.

B. DWSRF Set-asides and Unliquidated Obligations (ULOs)
For FFY 2014, \$14,226, 000 of the \$14,251,000 of the DWSRF funds were awarded.
\$25,000 was held back to assist with the Drinking Water Needs Survey contract.

For FFY2015, ODEQ requested (July 2015), and will receive (by 08/31/15), the post—rescission amount of \$14,157,000 for all available DWSRF set-asides. These are the 4% (\$566,280) DWSRF Administrative Set-aside, the 2% (\$283,140) Small System Technical Assistance Set-aside, the 10% (\$1,415,700) State Program Management Set-aside (which requires a 1:1 match), and the 15% (\$2,123,550) Local Assistance Set-aside.

The state maintains separate and identifiable account for the portion of the capitalization grant to be used for set-asides. EPA staff reviewed payroll data for the DWSRF program for SFY 2014 and all records show that staff is recording actual time spent on the SRF program and proper internal controls and approvals are in place to verify staff time and reporting. ODEQ does a good job in managing set-aside funds and does not have a ULO problem.

EPA commends the ODEQ and OWRB for the financial management and staffing of the DWSRF program. All financial, accounting, and internal control processes are well documented and updated regularly in standard operating procedures (SOPs) and all SOPs were provided to EPA for review. OWRB management regularly analyzes the sustainability of the program to ensure it will exist into perpetuity and regularly gets advice and cash flow modeling from their financial advisors, First Southwest Company. Financial and accounting records, as well as internal controls of the funds, are well managed and documented.

The State reported the following cumulative financial indicators:

| DWSRF   | National<br>2014 | State 2012    | State 2013    | State 2014    |
|---|------------------|---------------|---------------|---------------|
| Federal Return on Investment                        | 176%             | 326.0%        | 347.2%        | 355.5%        |
| Assistance as a % of Funds Available                | 92.7%            | 96.9%         | 102%          | 90.3%         |
| Disbursements as % of Assistance Provided           | 85.5%            | 84.5%         | 87.7%         | 91.9%         |
| Additional Assistance due to Leveraging             | -                | \$322,413,860 | \$361,063,787 | \$338,362,887 |
| Net Return on Contributed Capital Excluding Subsidy | · <b>-</b>       | 2.4%          | 2.1%          | 1.5%          |
| Set-Aside Spending Rate                             | 86.4%            | 90.6%         | 92.6%         | 90.8%         |

The financial indicators show that the return of federal investment has remained very strong over the last few years. The assistance provided as a percent of funds available (also referred to as the "pace" of the program) is strong and above the National average. Disbursements as a percent of assistance provided have remained stable. The state is monitoring the submission of disbursement requests and processes them timely. The OK-DWSRF has a strong leveraging program and provides funds to communities according to demand using the leveraged funds. The sustainability of the program is ensured for perpetuity.

Current ULOs for ODEQ, as of 10/15/14 (excluding Admin set-aside):

| Grant #             | Total UL9   | 2% SST   | 10% State<br>Program | 15% Eccal<br>Assistance |
|---------------------|-------------|----------|----------------------|-------------------------|
| FS986814-12 (FFY12) | \$0         | \$0.00   | \$0.00               | \$0                     |
| FS986814-13 (FFY13) | \$687,813   | \$0      | \$0                  | \$0                     |
| FS986814-14 (FFY14) | \$5,734,176 | \$31,220 | \$73,016             | \$933,961               |
|                     | \$6,421,989 | \$31,220 | \$73,016             | \$933,961               |

During 2015, Grant # FS-986814-12, was financially closed with the receiving and processing of the final federal financial report on 03/30/2015.

### 1. Quality Assurance Requirements

The Quality Assurance requirements for ODEQ's PWSS program are current as of the EOY program review. The Quality Management Plan (QMP) is a document describing the overall quality assurance efforts in the State. This includes the State's overall quality management philosophy and the agency's responsibility for administering the quality assurance program. An approved QMP and/or QAPP is generally a condition of federal funds. The current approved QMP #15-011 will expire December 01, 2015. The Quality Assurance Project Plans (QAPPs) stress data quality objectives related to sample collection and sample analysis. Currently, there are two QAPPs related to the drinking water program. One plan (QTRAK#13-305) focuses on data processing related to compliance activities and will expires on June 18, 2016. The other plan (QTRAK#15-064) covers a water loss pilot project, expiration December 1, 2017. Quality assurance plans are due to EPA at least 60 days prior to expiration of the previously approved plan, to allow for review and approval of the updated plan.

## 2. Advanced Monitoring Plan for PWSS grants

As was discussed by Javier Ballí during the Drinking Water Five State meeting on January 24, 2015, advanced monitoring may be (i.e., no definite plans yet) conducted on the ODEQ PWSS grant at the time of the annual DWSRF oversight review during FFY16 of the SFY15 DWSRF program.

# Appendix A-Fiscal Year 2014 Program Summary

| Tab | ble of Contents  | *.  |
|-----|--|-----|
| I.  | Introduction   | A-1 |
| II. | Summary  | A-1 |
|     | October 2014-Operator Certification and PWSS/SRF Grants                  | A-2 |
| r   | December 2014-Capacity Development                                       | A-2 |
|     | January 2015-Source Water Protection, Water Security, & Sanitary Surveys | A-3 |
|     | February 2015-SDW Rule Management  | A-3 |
|     | March 2015-Laboratory Certification & Capacity                           | A-5 |
|     | April 2015-General Counsel   | A-5 |
|     | May 2015-Enforcement   | A-5 |

### Introduction

During the 2014 fiscal year, EPA Region 6 piloted SharePoint as a way to conduct this annual review. The pilot involved conducting monthly calls with ODEQ staff reporting status updates on the various components reviewed during a traditional end of year (EOY) review. Additional work is needed by EPA Region 6 to help include ODEQ staff in the SharePoint site, where staff can independently report status updates. While the pilot was not a complete success, the information provided in this summary will constitute the ODEQ EOY review for 2014.

Title 40 of the Code of Federal Regulations (40 CFR) Part 142.17 (a)(1) states: At least annually the Administrator shall review, with respect to each State determined to have primary enforcement responsibility, the compliance of the State with the requirements set forth in 40 CFR part 142, subpart B, and the approved State primacy program. This report summarizes the required primacy end-of-year (EOY) review of the Oklahoma Department of Environmental Quality (ODEQ) Public Water Supply Supervision (PWSS) Program by the Environmental Protection Agency (EPA) Region 6 (R6) Source Water Protection Branch, Drinking Water Section.

The ODEQ program elements, which were previously adopted by the State and approved by EPA to meet 40 CFR 142.10 primacy requirements, are examined as well as State activities to meet new primacy requirements and initiatives under the 1996 Amendments to the Safe Drinking Water Act (SDWA). ODEQ's achievements, activities, and shortfalls are highlighted throughout the report.

# **Summary**

Starting in October 2014, each monthly call held with the state included an agenda item for End of Year reporting. Table 1 shows the topics covered during each conference call.

| Month of Call | Topic Covered                       |
|---------------|-------------------------------------|
| October       | Operator Certification & Grants     |
| December      | Capacity Development                |
| January       | Source Water Protection, Water      |
|               | Security, & Sanitary Surveys        |
| February      | Rule Management                     |
| March         | Laboratory Certification & Capacity |
| April         | Legal & Tribal                      |
| May           | Enforcement (Engineering)           |

Table 1-EOY Agenda Topics

During the monthly call the responsible staff were to provide a recap of the year's activities. In addition staff were requested to bring up challenges and expectations for the upcoming year.

Listed by topic, below, are the summary notes from each monthly report-out.

October 2014-Operator Certification and PWSS/SRF Grants

Operator Certification Update-Chris Wisniewski

- Due to state statute modifications, over 1,100 water operator licenses new modifications during the renewal process.
- Currently, the program is fully staffed and the renewal process is running smoothly.
- Work is continuing on technical advancements including online renewal process and the creation of an online application process.
  - Online Application process is pending state action with a 3rd party state contract
- Contracting with Rose State College's Oklahoma Environmental Learning Center to revise study guides

## SRF/PWSS Update-Patty Thompson

- Both the SRF and PWSS sections are fully staffed.
- During 2014, Funding was granted for 7 projects and 20 subsidies issued on consolidation projects.
- ODEQ continues to manage funds and avoid ULOs.
- ODEQ's QMP was set to expire on November 16, 2014 and has since been renewed.

December 2014-Capacity Development Brandon Bowman

## Past Year Recap

o Revision of Cap Dev assessment form

Revisions to the form included extensive expansion of the information. No longer is the form a simple three page check sheet but now a more substantial seven page assessment. The forms now include a technical review section, which was missing in the previous forms. Also all sections have increased emphasis on sustainability.

- o During 2014, templates for financial, managerial, SOP, personnel policies were developed.
- o Work during this time emphasized on-site, one-on-one financial, managerial, and technical assistance during assessments, overall 16 assessments were completed in 2014.
- Active participation in AWOP program was evident by the assessment and assistance with Cap Dev issues in the AWOP CPE process and participation in the weeklong CPE at Nowata.
- Also completed in 2014 was outreach across the state in a five, day-long seminars, focused on water reuse, funding, capacity development, and a technical advice and assistance section that was tailored to each region of the state, titled Enhancing Public Water Supply Compliance and Performance in a Changing World

## Upcoming Year

- o Water Loss Auditing pilot program
  - Pilot Project includes conducting 40 water loss audits across the state.
  - Results from the audits will be used to develop action plans for each system to address water loss and enhance sustainability.

o Efforts will also be focused on conducting rate studies along with continued on-site, one-on-one financial, managerial, and technical assistance.

January 2015-Source Water Protection, Water Security, & Sanitary Surveys Robert Huber

- During 2014, 2569 inspections (San Surveys) were completed which is an increase from last year's numbers.
  - O These surveys identified 535 critical violations, 76 of those were still unaddressed at the follow-up inspection and were sent to district engineers for assistance and enforcement.
- Environmental Complaints and Local Services (ECLS) staff has been working on having better contact/communication with PWSs, focusing on the "art of communication" during face to face encounters.
- Work continues on refining the automated progress for inspections and tablets should be updated in the upcoming year.
- Staff will be involved in the upcoming Water loss pilot.
  - o 10 ECLS Level 4 Environmental Specialists have completed a 40 hour training on conducting Water Loss Audits.
- Technical Assistance continues to be a high priority for the group.
  - O During 2014, ECLS handled over 204 complaints for PWS with taste/odor and other issues. In additional over 140 technical reports were logged. It should be noted that fully documenting this number is underreported, due to various staff not properly logging, documenting and recording assistance provided.
  - o Management will focus on increasing institution knowledge with in house training for both new ECLS and District Engineer staff.

## February 2015-SDW Rule Management Erin Lovelady-CCR

Working on the following items

- Sending out violations letters
- In 2014, developed and sending out pamphlets on using the CCR iwriter, with detailed instructions, current feedback is show this effort to have a positive impact.
- 84 PWSs have returned to compliance.
- Upcoming work will include sending out reminder notifications for the July 1 deadline, sending out violations letters, and updating the web page with new information.

### Jamie-PWS Inventory & SOCs

- During the past year, efforts were focused on SOCs and providing monitoring wavier packets to PWSs.
- Looking to work with DEs on small group of large systems and then rolling out state wide SOC monitoring and waivers.

## Sheri McGuire-Inorganics, Volatile Organics, & Radiochemical Rules

Rads

- Reviewed monitoring histories and several PWSs placed on reduced monitoring during 2014.
- Inorganics
  - 2014 saw a new in-house email method for notification from the state lab for Nitrite/Nitrate samples great than the MCL.
    - Upcoming work will include establishing this process with outside labs.
  - A possible V&E for US Gypsum PWS has been discussed among staff. ODEQ will need to seek regulatory authority to issue a variance.
- VOCs
  - In 2014, all line replacements for PWS with incorrect piping material, causing VOCs in the distribution system was completed.

### Emily Hoskin-Disinfection Byproducts Rule

- During 2014, DBP training was completed for ECLS and operators throughout the state.
- Efforts were also make to complete compliance monitoring plans (CMP). As of February 2015, 99% of PWSs have CMP in place.
- Upcoming work will include issuing NOVs for a couple of hundred monitoring violations, cleaning up data and issuing consent orders.

## Jordan Canary- Surface Water Treatment Rules

- Past work has included returning to compliance and closed past LT1 NOVs and PNs.
- In 2014, reminder letters were sent to PWSs for the remaining LT1 violations.
- Work was done to update FANLs that were falsely creating monitoring violations. These mismatched FANLs were creating over 250 violations per month.

## Jennifer Alig- GWR & Boil Advisories

- GWR
  - During 2014, efforts were made to send out education information based on differences with primacy transition from EPA to PWSs.
  - Staff completed a state-wide outreach "roadshow" meeting with PWSs, labs, other DEQ staff, and OML on rule implementation and compliance assistance.
  - Work still continues with issuing violations and sent out notifications.
  - Still working out Wholesaler/Purchase PWS notification process and violations
  - Work to overcome the learning curve with the SDWIS GWR\BridgeTool and which schedules to migrate.
- Boil Advisories
  - There was an increase in Boil Advisories which might be a result from legislation to regulate NC systems who "serve" food, these systems were originally Non-Public systems, in 2014.

# Bryan Niblett Total Coliform Rule & Lead and Copper Rule

- Pb/Cu
  - o During 2014 information and forms posted on the ODEQ web site was updated.
  - Staff also worked on the final phase of consecutive connection sampling under the Lead and Copper Rule.
- TCR

- This rule was a new assignment for Bryan, during the 2014 year.
- Weekly meetings were held to the learn the Revised Total Coliform Rule and work was done on developing forms, including paper and electronic versions for the various assessments and sampling plans.

# March 2015-Laboratory Certification & Capacity Chris Armstrong

- O Unanticipated funding in 2014, has helped to purchase new equipment to replace aging equipment in the drinking water section of the lab. However, at the same time, there has been a 10% cut in state appropriations to the lab.
- o Lab Cert-Cincinnati needs to know the following
  - Discussions have taken place between TNI and EPA on training and conducting drinking water laboratory audits. The primary focus has been on audits and the process for conducting the audit, method or technique based.
- ODEQ believes training for Certification Officers is critical and EPA should offer more opportunities for the schooling.
- o Overall lab capacity can meet the needs of PWSs in the state, with 25 commercial drinking water labs.
  - The state lab anticipates a challenge with educating the smaller systems and private labs on the RTCR changes in 2015 and 2016.

## April 2015-General Counsel

- o During the past year, General Counsel has worked with staff to finalize a DBP2 consent order template.
- Legal has also be involved in the Water Loss Audit pilot, specifically working on the bid process for staff training.
- o Tribal authority continued to be a subject of discussion for General Counsel in 2014 and will continue to be in the upcoming year as tribes continues to operate PWSs that serve non-tribal members.

# May 2015-Enforcement PWS Enforcement (DEs)

### Dawn Hoggard

- Work in 2104, focused on drought in western Oklahoma.
- Technical assistance was needed at the City of Clinton due to limited surface water source availability. Work will continue in 2015 with overhauling sources for the PWS including adding groundwater sources.

Note: Clinton was selected for EPA HQ Drought Resiliency Project

## **Candy Thompson**

- During the past year, work with Taylor Ferry Marina, privately owned PWS in Wagoner county, to address turbidity and Cl<sub>2</sub> problems.
- After site visits and penalty orders the PWS opted to purchase water from a rural water district.

### Dave Mercer-Regionalization

 Worked on improving DBP compliance for Nobel Co # 1 PWS. Technical assistance on membrane filtration proved too much for this small PWS. The system is now connected to Perry CO #3.

### Jesi Lay

- In 2014, provide technical assistance to McAlester that ultimately prevented a treatment technique violation.
- Even after rehabbing the filters, the system was still having turbidity issues.
- A site visit identified a cross connection at the plant that was causing the turbidity issues.

### Shane Hacker

 During 2014 a great deal of phone calls were related to sampling compliance. In additional extensive work continues with assisting Tishomingo PWS on a full plant rehab.

## Shawn Wiegmann (hired within the last 6 months)

• While being new, 2014 was still a successful year, work included participated in comprehensive performance evaluation and working with unpermitted wells.

## Mark Fogleman( hired < 6 months ago)

 As the newest district engineer, work was focused on responding to boil advisories and conducing level 2 assessments related to coliform samples.

## Attachment B - 40 CFR 142.10 Primacy Requirements

Regulations specified in 40 CFR 142.10 require states that have been delegated primary enforcement authority (primacy) for the Safe Drinking Water Act to meet the following requirements:

- 1. Adopt drinking water regulations which are no less stringent than the national primary drinking water regulations (NPDWRs);
- 2. Adopt and implement adequate procedures for enforcement of such State regulations;
- 3. Maintain an inventory of public water systems;
- 4. Develop a systematic program for conducting sanitary surveys of public water systems in the State:
- 5. Establish and maintain a State program for the certification of laboratories conducting analytical measurements of drinking water contaminants;
- 6. Assure the availability to the State of laboratory facilities certified by the Administrator and capable of performing analytical measurements of all contaminants specified in the State primary drinking water regulations;
- 7. Establish and maintain an activity to assure that the design and construction of new or substantially modified public water system facilities will be capable of compliance with the State primary drinking water regulations;
- 8. Have authority to apply State primary drinking water regulations to all public water systems in the State;
- 9. Have authority to sue in courts of competent jurisdiction to enjoin any threatened or continuing violation of the State primary drinking water regulations;
- 10. Have right of entry and inspection of public water systems;
- 11. Have authority to require suppliers of water to keep appropriate records and make appropriate reports to the State;
- 12. Have authority to require public water systems to give public notice that is no less stringent than EPA requirements in 40 CFR 142.32 and 142.16(a);
- 13. Have authority to assess civil or criminal penalties for violation of the State's primary drinking water regulations and public notice requirements;
- 14. Have authority to require community water systems to provide consumer confidence reports as required under 40 CFR part 141, subpart O;
- 15. Establish and maintain record keeping and reporting of its activities, including quarterly reports to the Administrator (Safe Drinking Water Information System) of violations, enforcement actions, notification of any variances and exemptions, and water system inventory information from the previous quarter;
- 16. If the State permits variances or exemptions, or both, from the requirements of the State primary drinking water regulations, the State shall do so under conditions and in a manner no less stringent than federal requirements;
- 17. Adopt and implement an adequate plan for the provision of safe drinking water under emergency circumstances;
- 18. Have authority for assessing administrative penalties.

# Attachment C – Primacy Revision & Program Updates for Oklahoma

| (Revised 3/10/14)  | State Adoption |       |          | acy Revision<br>ication | Final EPA Approval |                           |  |
|--|----------------|-------|----------|-------------------------|--------------------|---------------------------|--|
| Rule   | Status         | Date  | Status   | Date                    | Status             | Date                      |  |
| IESWTR   | Adopted        | 6/00  | Received | 11/01/00                | Approved           | 10/15/01                  |  |
| Stage 1 DBPR   | Adopted        | 6/00  | Received | 11/01/00                | Approved           | 10/15/01                  |  |
| CCR  | Adopted        | 6/00  | Received | 11/01/00                | Approved           | 10/15/01                  |  |
| Administrative Penalty Authority                         | Adopted        | 1986  | Received | 11/01/00                | Approved           | 10/15/01                  |  |
| Arsenic Rule   | Adopted        | 10/02 | Received | 11/26/02                | Approved           | 09/24/03                  |  |
| Public Notification Rule                                 | Adopted        | 10/02 | Received | 11/26/02                | Approved           | 09/24/03                  |  |
| Radionuclide Rule  | Adopted        | 10/02 | Received | 11/26/02                | Approved           | 09/24/03                  |  |
| Filter Backwash Recycling Rule                           | Adopted        | 10/02 | Received | 11/26/02                | Approved           | 09/24/03                  |  |
| LT 1 Rule  | Adopted        | 10/02 | Received | 11/26/02                | Approved           | 09/24/03                  |  |
| New PWS Definition                                       | Adopted        | 6/00  | Received | 11/26/02                | Approved           | 09/24/03                  |  |
| Lead & Copper Rule Minor Revisions                       | Adopted        | 02/01 | Received | 6/26/01                 | Approved           | 09/24/03                  |  |
| Lead and Copper Rule Minor<br>Revisions & Clarifications | Adopted        | 02/09 | Received | 10/20/09                | Approved           | 04/26/10                  |  |
| Stage 2 DBPR   | Adopted        | 02/13 | Received | 9/19/13                 | Approved           | 1/08/2014                 |  |
| LT2 Enhanced Surface Water<br>Treatment Rule             | Adopted        | 02/13 | Received | 9/19/13                 | Approved           | 1/08/2014                 |  |
| Ground Water Rule  | Adopted        | 02/13 | Received | 9/19/13                 | Approved           | 1/08/2014                 |  |
| Revised Total Coliform Rule                              | Adopted        | 04/15 | Received | 4/03/15                 | Pending .          | Anticipated<br>12/03/2015 |  |
| Variance and Exemption Rule                              | N/A            |       |          |                         |                    |                           |  |

|   | Deadline for EPA | Draft Progra | m Submitted | Final Progra | m Approval |
|---|------------------|--------------|-------------|--------------|------------|
| Program Area                              | Final Approval   | Projected    | Actual      | Projected    | Actual     |
| Capacity Development-<br>existing systems | 08/06/00         |              | 03/21/98    | 09/00        | . 08/00    |
| Operator Certification                    | 02/05/01         |              | 06/21/99    | 02/01        | 02/01      |

# Attachment D – FY2015 Oklahoma Violation Data & Inventory Information

Number of Systems in Violation in Oklahoma During FY 2014 (October 1, 2013 thru September 30, 2014 as of July 15, 2015) (Small <= 3,300; Medium: 3,301 - 10,000; Large >10,000)

| MCL, TT, and MRDL<br>Violations  |                   | Community                   |                                     | Non-Transient<br>Non-Community |       | Transient<br>Non-Community |                            |       | Total  |       |                       |
|--|-------------------|-----------------------------|-------------------------------------|--------------------------------|-------|----------------------------|----------------------------|-------|--------|-------|-----------------------|
| (Health Based Sta  | ndards)           | Small                       | Medium                              | Large                          | Small | Medium                     | Large                      | Small | Medium | Large |                       |
|  | Arsenic           | 5                           |                                     | 2                              |       |                            |                            |       |        |       | 7                     |
| D1 TT/87   | IOC               |                             |                                     |                                | 1     |                            |                            |       |        | r     | 1                     |
| Phase II/V   | Nitrates          | 19                          |                                     |                                | 1     |                            |                            | 6     |        |       | 26                    |
|  | VOC               | 1                           |                                     |                                |       |                            |                            |       | •      |       | . 1                   |
| Radiological (Rads)  |                   | 13                          | 1                                   | 1                              |       |                            |                            |       |        |       | 15                    |
| Disinfection By-   | Stg1              | 23                          | 3                                   | 2                              | 1     |                            |                            |       |        |       | 29                    |
| Products Rule  | Stg2              | 164                         | 27                                  | 12                             | 4     |                            |                            |       |        |       | 207                   |
| Surface Water  | LT1               | 9                           | 3                                   |                                |       |                            |                            | 1     |        |       | 13                    |
| Treatment Rules  | LT2               |                             |                                     | 2                              |       |                            |                            |       |        |       | 2                     |
| Lead and Copper Ru   | le                | 16                          |                                     | ,                              | 7     |                            |                            |       | -      |       | 23                    |
| Total Coliform Rule  |                   | 45                          | 8                                   | 6                              | 7     |                            |                            | 23    |        |       | 89                    |
| M and R and Consun<br>Notification Violation   |                   | . (                         | Community Non-Transie<br>Non-Commun |                                |       |                            | Transient<br>Non-Community |       |        | Total |                       |
|  |                   | Small                       | Medium                              | Large                          | Small | Medium                     | Large                      | Small | Medium | Large |                       |
|  | Arsenic           | 14                          | 1                                   | 1                              | 6     |                            |                            |       |        |       | 22                    |
|  | IOC               | 10                          | · 1                                 |                                | 3     |                            |                            |       |        |       | 14                    |
| Phase II/V   | Nitrates          | 27                          | 2                                   | 2                              | 7     |                            |                            | 70 .  |        |       | 108                   |
| and the second s |                   |                             |                                     |                                |       |                            |                            |       |        |       | 23                    |
|  | SOC               | 15                          | 3                                   | 4                              | 1     |                            |                            |       |        |       |                       |
|  | SOC<br>VOC        | 15<br>19                    | 3                                   | 2                              | 4     |                            |                            |       |        |       | ·26                   |
| Disinfection By-   |                   |                             | <del> </del>                        |                                |       |                            |                            |       |        |       | 26<br>41              |
|  | VOC               | 19                          | 1                                   | 2                              | 4     |                            |                            |       |        |       |                       |
| Products Rule<br>Surface Water   | VOC<br>Stg1       | 19<br>32                    | 1 4                                 | 2                              | 4     |                            |                            |       |        |       | 41                    |
| Products Rule<br>Surface Water<br>Freatment Rules  | VOC Stg1 Stg2 LT1 | 19<br>32<br>224             | 1 4                                 | 2                              | 4     |                            |                            | 2     |        |       | 41<br>264             |
| Products Rule<br>Surface Water<br>Freatment Rules<br>Lead and Copper Ru  | VOC Stg1 Stg2 LT1 | 19<br>32<br>224             | 1 4 18                              | 2<br>4<br>14                   | 1 8   |                            |                            | 2 8   |        |       | . 41<br>264<br>1      |
| Disinfection By-<br>Products Rule<br>Surface Water<br>Treatment Rules<br>Lead and Copper Ru<br>Ground Water Rule<br>Total Coliform Rule  | VOC Stg1 Stg2 LT1 | 19<br>32<br>224<br>1<br>114 | 1 4 18 3                            | 2<br>4<br>14                   | 1 8   |                            |                            |       |        |       | 41<br>264<br>1<br>130 |

## Number of Violation in Oklahoma During FY 2014 (October 1, 2013 thru September 30, 2014 as of July 15, 2015) (Small <= 3,300; Medium: 3,301 - 10,000; Large >10,000)

| MCL, TT, and M   |                                    | Communit                                | ty                                 | Non-Transient Transient Non-Community Non-Community |                                |             |                            |        |                   |        |  |
|--|------------------------------------|---|------------------------------------|---|--------------------------------|-------------|----------------------------|--------|-------------------|--------|--|
| Violations<br>(Health Based Sta  |                                    | Small                                   | Medium                             | Large   | Small                          | Medium      | · ·                        |        | n-Commu<br>Medium | Large  | Total                                    |
|  | Arsenic                            | 21                                      | 1770010111                         | 5   | Jiman                          | Medium      | Large                      | Ollian | TVICUIUM          | Large  | 26                                       |
|  | IOC                                |   |                                    |   | 12                             |             |                            |        |                   |        | 12                                       |
| Phase II/V   | Nitrates                           | 56                                      |                                    |   | 4                              |             |                            | 9      |                   |        | 69                                       |
|  | VOC                                | 2                                       |                                    |   |                                |             |                            |        |                   |        | - 2                                      |
| Radiological (Rads)  |                                    | 50                                      | 8                                  | 6   |                                |             | •                          |        |                   |        | 64                                       |
| Disinfection By-<br>Products Rule  | Stg1                               | 56.                                     | 11                                 | 6   | . 1                            | ·           |                            |        |                   |        | 74                                       |
|  | Stg2                               | 387                                     | 61                                 | 39  | 5                              |             |                            |        |                   |        | 492                                      |
| Surface Water  | LT1                                | 27                                      | 3                                  |   |                                |             |                            | 1      |                   |        | 31                                       |
| Treatment Rules  | LT2                                |   |                                    | 8   |                                |             |                            |        |                   |        | 8  |
| Lead and Copper Rule   | <b>.</b>                           | 23                                      |                                    |   | ٠8                             |             |                            |        |                   |        | 31                                       |
| Total Coliform Rule  |                                    | 64                                      | 10                                 | 7   | 8                              |             |                            | 27     |                   |        | 116                                      |
| M and R and Con<br>Notification Viola  |                                    | (                                       | Communit                           | y   | Non-Transient<br>Non-Community |             | Transient<br>Non-Community |        |                   | Total  |  |
|  |                                    | Small                                   | Medium                             | Large   | Small                          | Medium      | Large                      | Small  | Medium            | Large  |  |
|  |                                    |   |                                    | ~ St  | Sman                           | ., Louisini |                            | ->     |                   | -u. 60 |  |
|  | Arsenic                            | 18                                      | 2                                  | 3   | 7                              | A COLUMN    |                            |        | ·                 | Zin ge | 30                                       |
|  | Arsenic<br>IOC                     | 18<br>62                                |                                    |   |                                |             |                            |        |                   |        | 30<br>87                                 |
| Phase II/V   |                                    |   | 2                                  |   | 7                              |             |                            | 100    |                   | Zim gv |  |
| Phase II/V   | IOC                                | 62                                      | 2                                  | 3   | 7                              |             |                            |        |                   |        | 87                                       |
| Phase II/V   | IOC<br>Nitrates                    | 62<br>45                                | 2<br>11<br>3                       | 2   | 7<br>14<br>10                  |             |                            |        |                   | Zange  | 87<br>160                                |
|  | IOC<br>Nitrates<br>SOC             | 62<br>45<br>21                          | 2<br>11<br>3<br>7                  | 2 4   | 7<br>14<br>10                  |             |                            |        |                   | Zimge  | 87<br>160<br>33                          |
| Disinfection By-   | IOC Nitrates SOC VOC               | 62<br>45<br>21<br>736                   | 2<br>11<br>3<br>7<br>42            | 2 4 42  | 7<br>14<br>10<br>1<br>168      |             |                            |        |                   | Zimge  | 87<br>160<br>33<br>988                   |
| Disinfection By-<br>Products Rule<br>Surface Water   | IOC Nitrates SOC VOC Stg1          | 62<br>45<br>21<br>736<br>56             | 2<br>11<br>3<br>7<br>42<br>6       | 3<br>2<br>4<br>42<br>7                              | 7<br>14<br>10<br>1<br>168      |             |                            |        |                   |        | 87<br>160<br>33<br>988<br>70             |
| Disinfection By-<br>Products Rule<br>Surface Water<br>Treatment Rules  | IOC Nitrates SOC VOC Stg1 Stg2 LT1 | 62<br>45<br>21<br>736<br>56<br>580      | 2<br>11<br>3<br>7<br>42<br>6       | 3<br>2<br>4<br>42<br>7                              | 7<br>14<br>10<br>1<br>168      |             |                            |        |                   |        | 87<br>160<br>33<br>988<br>70<br>674      |
| Disinfection By-<br>Products Rule<br>Surface Water<br>Treatment Rules<br>Lead and Copper Rule                      | IOC Nitrates SOC VOC Stg1 Stg2 LT1 | 62<br>45<br>21<br>736<br>56<br>580<br>5 | 2<br>11<br>3<br>7<br>42<br>6<br>42 | 3<br>2<br>4<br>42<br>7<br>34                        | 7<br>14<br>10<br>1<br>168<br>1 |             |                            | 100    |                   |        | 87<br>160<br>33<br>988<br>70<br>674<br>5 |
| Phase II/V  Disinfection By- Products Rule  Surface Water Treatment Rules  Lead and Copper Rule  Ground Water Rule | IOC Nitrates SOC VOC Stg1 Stg2 LT1 | 62<br>45<br>21<br>736<br>56<br>580<br>5 | 2<br>11<br>3<br>7<br>42<br>6<br>42 | 3<br>2<br>4<br>42<br>7<br>34                        | 7<br>14<br>10<br>1<br>168<br>1 |             |                            | 100    |                   |        | 87<br>160<br>33<br>988<br>70<br>674<br>5 |

# Attachment E - WQD-Organizational Chart

legal Coursel - Environmental Altomeys

Env Afformey Supervisor

(COD4) Env Affarney I (0064) Env Attorney III (0052)

Scott Cordell Env Affarney I (0027)

Jennäfer Boyle Courtney Carter

CONSTRUCTION

Belsey Skevli

ADMINISTRATION

Division Director (1658) Assistant Division Director (1430) Engineering Manager IV (1596)

Division Secretary IV (0029)

Reciphred

Water Guality Planning

Engineering Mgr. III (1642)

Patrick Rosch

Secretary II (1404))

Brendo Gayle

Watershed

Shellie Chard-McClary Terry Lyhane Carl Parrott

Sharon Smith [3/2/16]

Public Water Supply Engineering Mgg. III (1592) Potty Thompson

Secretory 8 (1524) Cynthia Morgan

WOMAC, Finance, Personnel Support & Emergency Response Env Programs Manager III (1369) Mark Hildebroad

Adm Asst II - Rorence Fields (1487) Sect I - Michelle Dinh (1540) EPM/EM I - Vocant (need to add position)

Wastewater Engineering Mgr. III (0506) Michael Moe

> Secretory II (0190) Melessa Dan

Technical Support & Operator Certification Env. Programs Mgr. III (0103) Dovid Praitt Adm. Azzt. II (1500)

New Gen Reporting,

| L | Alshu i   | Softern  |
|---|---|--|
|   | NEXT GEN REPORTING, TECHNICAL SUPPORT & OA/OC Eng Mgr. 1 [1593] Monk Desichsweiter              | OPERATOR<br>CERTIFICATION<br>Brv. Frog. Mgr. B<br>11977!<br>Chris Wantewski<br>Secretary I<br>(1809)<br>Rose Herrera |
|   | PE III (1615)<br>Sleve Wright<br>EPS IV (1669)<br>Shent Tilley<br>EPS III (1668)<br>Karen Miles | EPS II (1664) Prost Porter (11/17/15) EPS III (1672) "Andy" Collaway Adm Asst I (1880) Gratichen Anderson            |

| CONSTRUCTION PERMITTING/ ENGINEERING REPORT  Eng. Mgr. 1 [1599] Rocky Chen  | Watershed<br>Planning<br>Env Frog Mgr I<br>(1685)<br>Joe Long<br>(11/4/15)   | Water/Water<br>Beuse<br>EPM II/EM II<br>(need to add<br>Position) |
|---|--|---|
| PE IN (1599) Querry Kohoniii  EPS IV (1463) Robert Wesker  Bill (0415) Wendy Sheets (7/12/15)  El IV (1614) Sero Senyonde (1/12/16)  Bill (1704) Adom Divine  El IV (1420) Koren Steele  El IV (1633) Jonathan Looper (8/22/18) | El (1721) Vacant El IV (1823) David Akakpo EPS IV (1865) Vacant Er'S III (0746) Bena Ugoutina El IV (1821) Socieng Lim (9/8/15) Adm Fech III (1441) Robin Bankhead | Vecant Vecant (need to Add positions)                             |

| ٦ | PWS                            | PWS                          | DNYSRF                         |
|---|--------------------------------|------------------------------|--------------------------------|
| ı | COMPLIANCE                     | FIELD INSP                   |                                |
| 1 | TRACKING                       | ENFORCEMENT                  |                                |
| ı | Env. Prog. Mar. II             |                              | Eng. Algs II                   |
| ı | (0955)                         | Eng. Mgr. 8 (8155)           | (1647)                         |
| ŀ | Michele Welsh                  | Key Coffey                   | Greg Con                       |
| ŀ |                                |                              | (8/16/15)                      |
| ı | '                              |                              |                                |
| ı |                                |                              |                                |
| ١ |                                |                              |                                |
| ٦ | EPS (V (0974)                  |                              |                                |
| ı | Jennier Alig                   | PE II (1634)                 | PE III (1714)                  |
| ı | T -                            | Condy Thompson               | Lestie Sm@h                    |
| ı | EPS (11023)                    | DE 12 23 23 DE               | ŀ                              |
| 1 | Shert McGuire                  | PE II (1630)<br>David Mercer | EPS IV (1667)                  |
| ı |                                |                              | Vicid Reed                     |
| ı | EPS (II (0763)                 | (7/26/15)                    | [                              |
| ı | Jamle Henson                   | PE III (140B)                | EPS IV (1664)                  |
| 1 | CDE AN ADOTHE                  | Dawn Hoggard                 | Kris# Roy                      |
| ı | EPS III (0239)<br>Emily Hoskin | Outri i loggana              |                                |
| ı | (12/15/15)                     | Ei II (1717)                 | PE II (1544)<br>Eddie Rhaadour |
| ı | Faxt 190 193                   | Shame Hocker                 | (7/26/15)                      |
| ı |                                | (8/31/15)                    | (1/20/15)                      |
| ı | EPS 1 (1022)                   |                              | EH (1712)                      |
| ı | Jordon Congry                  | EI III (1715)                | Justin Hodge                   |
| 1 | E00 8 /400**                   | Yocant                       |                                |
| ı | EPS I (1021)                   | C. II VALIDA                 | Branden                        |
| ı | Bryon Nablest                  | £! !! (0173)                 | Bowman                         |
| 1 | (10/1/15)                      | Vacont                       | EPS IV (1673)                  |
| 1 |                                | EI II (0954)                 |                                |
| ı | EPS # (1495)                   | Shawa Wisamann               | PE III (0951)                  |
| ı | 8th tovelody                   | (10/13/15)                   | Sleven Hollman                 |
| ı | EP5 1 (0972)                   | Familiation and              | Adm. Asst. I                   |
| ı | Lourelin                       | Adm Assi 8 (1542)            | (1505)                         |
| 1 | Hodgson                        | Xomone Ha <u>ag</u> ins      | Cara Magaitt                   |
| ı | (5/11/16)                      |                              | 1                              |
| ı |                                | EI (0955)                    |                                |
| 1 |                                | Voccet                       |                                |
| ì |                                |                              |                                |
| ļ |                                |                              |                                |
| 1 |                                |                              |                                |
| 1 |                                |                              |                                |
| 1 |                                |                              |                                |
| 1 |                                |                              | i .                            |
| ١ |                                | l                            | I                              |

| WASTEWA<br>COMPLIA<br>Env. Prog. A<br>(1638)<br>Tom Boil | MCE<br>lgr. II<br>ey | INDUSTRIAL DISCHARGE PERMITTING Eng. Mgr. II (1597) Gord Protein Secretary I (1656) Januari Johnson | MUNICIPAL DISCHARGE & STORMWATER PERMITTING Eng Migr [1595] Vacant | Industrial &<br>Stormwater<br>Reld<br>Insp/Enforcement<br>Bag. Mgr. II (1591)<br>Wayne Craney | Municipal<br>Field Insp/<br>Enforcement<br>Eng. Mgr. U<br>(1674)<br>Brian Clagg<br>(10/13/15) |
|--|----------------------|---|--|---|---|
| EPS III (10<br>Wayne Ma                                  |                      | PE III (1405)<br>Micheal Jordan   | Stiv (1413)<br>Vence Doan  | fë in (D176)<br>Josen Ma  | PE III (1143)<br>Myles Mungis   |
| EPS III (14<br>Citories Gr                               | acia                 | EII (1602)<br>Torre Wale<br>(6/8/16)  | PE (ii (1419)<br>Mangilal "Toror"<br>Kakani                        | Et i (0952)<br>Colēn šaxen<br>(8/3/14)  | EPS (1) (1977)<br>Reshini Maznibler   |
| Adm Ass<br>(1579)<br>Melvin Tur                          | ·                    | PE II (1497)<br>James Grim  | Kim Doničja:<br>El ji (1134)                                       | EPS IR (1471)<br>Sleven Gurnels   | EPS IN (1675)<br>Sob Bolfles<br>Ell (1722)  |
| EPS III (15<br>David Sch                                 | milit                | ELIV (1627)<br>Bryce Callles  | PE III (1718)<br>Karen Millord                                     | PE II (1626)<br>Corrie Evenson<br>[7/11/15]   | Toby Haides<br>(7/1/16)   |
| Angela Ro  | HeDM                 | El III (0419)<br>Brendon Tyler<br>El III (1410)   | PE N (0417)<br>Ismat Exar<br>EH (14/16)                            | EPS III (1114)<br>Michele Loudenbock  | EFS IV (1473)<br>LISHY Phillips<br>(7/24/15)  |
| (1450)<br>Rockel Fo                                      |                      | Michele<br>Duspiva  | Matthew Butner<br>(7/13/16)  | 21 (1719)<br>Vacant   | PE I (1617)<br>Trovis Ascher  |
| (11/2/1:<br>EPS<br>Voces                                 | ·                    |   |  | PE (0411)<br>Diane McCay  | EII (160II)<br>Andrew<br>Middleton<br>(9/15/15)   |
| Yocar  | IF                   |   |  | tod Mollenkamp<br>(18/6/15)   | EH (1701)<br>Social Heaton  |
|  |                      |   |  | 2FS 1 (0713)<br>kijchelja Choo<br>(11/3/15)   | (7/1/16)  |
|  | -                    |   |  | Adm Assi 8<br>(1692)<br>Kim Wydii   |   |
|  |                      |   |  |   |   |

Green = Probation

Red = Vacant - Fillable Red = Vacant - No Freeze

Purple = Trial Period

SWIP/lies = Pins fied together

U – unciassified

Chart Revised 6/24/15

| -                                       |   |  |
|---|---|--|
| 000                                     |   |  |
| 200                                     |   |  |
| - Parker                                |   |  |
| 4                                       |   |  |
| -                                       |   |  |
|   |   |  |
|   |   |  |
|   |   |  |
|   |   |  |
| 1                                       |   |  |
|   |   |  |
|   |   |  |
| * 10000000                              |   |  |
|   | 1 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 |  |
| -                                       |   |  |
|   |   |  |
| Apres (Park)                            |   |  |
| · ·                                     |   |  |
| and the same                            |   |  |
| · ·                                     |   |  |
| - 1                                     |   |  |
| - Park                                  |   |  |
| . Total and a seal                      |   |  |
| , colonia                               |   |  |
| - Parente                               |   |  |
| Seater                                  |   |  |
|   |   |  |
| seisee//                                |   |  |
| - Participan                            |   |  |
| - Constitution                          |   |  |
| · ·                                     |   |  |
| de trockeda                             |   |  |
| in Politice                             |   |  |
|   |   |  |
|   |   |  |
| . syndron                               |   |  |
| · · ·                                   |   |  |
|   |   |  |
| -                                       |   |  |
|   |   |  |
|   |   |  |
|   |   |  |
|   |   |  |
| •                                       |   |  |
| ·                                       |   |  |
| -                                       |   |  |
|   |   |  |
| -                                       |   |  |
| - a                                     |   |  |
|   |   |  |
| - Parada                                |   |  |
| *************************************** |   |  |
| *******                                 |   |  |
|   |   |  |
| -constal                                |   |  |
| *************************************** |   |  |
| - 1                                     |   |  |
| A Special                               |   |  |
| to a contract                           |   |  |
| · March                                 |   |  |
| - Interdopera                           |   |  |
| 100                                     |   |  |
|   |   | en e |
|   |   |  |
|   |   |  |
|   |   |  |
|   | •                                       |  |